

EXHIBIT 16 REDACTED

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

WAYMO LLC,

Plaintiff,

Case

vs.

No. 3:17-cv-00939-WHA

UBER TECHNOLOGIES, INC.;

OTTOMOTTO LLC; OTTO TRUCKING LLC,

Defendants.

1

HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY

VIDEOTAPED DEPOSITION OF GAETAN PENNECOT

VOLUME III (PAGES 275 to 478)

FRIDAY, JUNE 16, 2017

Reported by:

Anrae Wimberley

CSR No. 7778

Job No. 2641228

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1 A. This is correct. 17:17:11

2 Q. And you're planning on being available for 17:17:13

3 that testimony? 17:17:14

4 A. Yes. 17:17:14

5 Q. You mentioned some [REDACTED] in the Velodyne 17:17:26

6 HDL-64. 17:17:27

7 Do you remember that? 17:17:29

8 A. Yes, this is correct. 17:17:30

9 Q. What's the difference between the [REDACTED] 17:17:32

10 in the Velodyne HDL-64 and the [REDACTED] that are in 17:17:36

11 GBR and Fuji? 17:17:38

12 A. I believe [REDACTED] in the HDL-64 is a [REDACTED] 17:17:47

13 [REDACTED]. 17:17:49

14 Q. As opposed to GBR and Fuji, which have a 17:17:52

15 [REDACTED]; right? 17:17:58

16 A. This is correct. 17:17:59

17 Q. Are you aware of any other LiDARs, other than 17:18:00

18 Fuji and GBR, that have [REDACTED] that you 17:18:06

19 worked on? 17:18:07

20 A. No. 17:18:12

21 Q. Okay. Counsel for Uber asked you if you were 17:18:19

22 aware of anyone having files from -- possessing files 17:18:26

23 from Google that worked at Uber; right? 17:18:29

24 A. Yes. 17:18:29

25 Q. You weren't including Anthony Levandowski in 17:18:32